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July 13, 1998

BY HAND DELIVERY

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

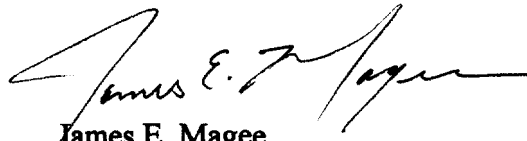
Re: CC Docket No. 97-211
Application of WorldCom, Inc. and MCI Communications Corporation

Dear Ms. Salas:

Enclosed on behalf of IXC Communications, Inc. ("IXC") for inclusion in the above-referenced docket is the Declaration of Gary L. Mann, Assistant General Counsel for IXC. Mr. Mann's Declaration provides information regarding the abilities of carriers other than WorldCom, Inc. or MCI Communications Corporation to provide long distance transmission services.

Please date-stamp the enclosed extra copy of this filing to acknowledge receipt by the Commission.

Sincerely yours,


James E. Magee

Enclosures

cc: Michelle Carey (CCB)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)
)
Applications of WorldCom, Inc. and)
MCI Communications Corporation for) **CC Docket No. 97-211**
Transfer of Control of MCI Communications)
Corporation to WorldCom, Inc.)

To: The Commission

DECLARATION OF GARY L. MANN

1. My name is Gary L. Mann. I am Assistant General Counsel for IXC Communications, Inc. (IXC). I have been asked by WorldCom to supplement the record in the above referenced proceeding by providing information about IXC and its products and services.
2. IXC is headquartered in Austin, Texas. The company had an Initial Public Offering in 1996 and is traded on NASDAQ under the symbol IIXC. We have approximately 800 employees. Our revenues more than doubled from 1995 to 1996 and, again, from 1996 to 1997. We reported \$421,000,000 in revenues in 1997.
3. IXC often had been referred to as a "carrier's carrier." Our traditional customers have been Tier 1 and Tier 2 interexchange carriers including AT&T, MCI, Sprint, WorldCom, Frontier, Excel, Cable & Wireless and LCI. In addition, we serve more than 120 of 800 Tier 3 carriers most of whom are regional switchless

resellers. This market has been expanding to include utilities, CATV, PCS/Cellular, CLEC and Internet service provider customers.

4. More recently, we have greatly expanded our focus on retail sales to small and medium sized businesses. Our retail services are marketed under the "Eclipse Telecommunications" brand name. Retail marketing resources include our recent acquisition of Network Long Distance, Inc. and Telecom One of Chicago. IXC also has a joint venture with UniDial.
5. On April 7, 1998, we completed the first portion of our nationwide fiber optic network -- a transcontinental route from Los Angeles to New York via Phoenix, Dallas, St. Louis and Cleveland. This was the first new coast-to-coast fiber network to be completed in more than a decade. We are continuing to expand that network. New routes are under construction linking Boston to Atlanta via New York and Washington; Atlanta to Miami via Orlando; Atlanta to Dallas via New Orleans and Houston; Las Vegas to Seattle via Salt Lake City; Los Angeles to San Francisco; and, Ciudad Juarez to Denver. Coming next will be routes from Atlanta to Louisville; Minneapolis to San Francisco via Kansas City and Denver; San Diego to Phoenix and Austin to Brownsville. Together, these routes will give us coverage over a vast portion of the United States with multiple redundant fiber rings. Next year, we will serve 95 of the top 100 metropolitan statistical areas (MSAs) over fiber and will be in more than 120 MSAs altogether. IXC will operate 176 POPs by the end of this year.
6. IXC now owns and operates more than 10,500 digital route miles of facilities. By the end of 1998, we expect the total number of digital route miles to climb to

18,000 route miles. And, by the end of 1999, we plan to have 20,000 digital route miles operational. The network is engineered to exceed 99.98 per cent availability. This facility costs about \$100,000 per mile to construct. IXC also has expanded its network by entering fiber exchange agreements with other carriers. For example, we have arranged exchanges with Metromedia in the eastern US and with GST on the West Coast. We also have arranged exchanges with FTV Communications and Vyvx, Inc. in other parts of the country.

7. The transmission facilities include non-zero dispersion shifted fiber utilizing a Synchronous Optical Network (SONET) ring architecture with OC-192 technology. This allows us to rapidly increase our capacity using dense wave division multiplexing (DWDM) and permits restoration speeds under 10 milliseconds. We believe this is the most efficient network design in operation today. This highly reliable, fast packet switching network fully supports advanced data services.
8. IXC already has deployed eight long distance switches and plans to add three more in 1998 for our voice traffic. We also have installed 18 ATM/Frame Relay switches and expect to have 25 or more by year-end 1998. Our entire operation is managed from our proactive Network Operations Center. We provide 24 hour monitoring with continuous self-diagnosis.
9. IXC's nationwide network supports a full range of voice, data and IP applications including:
 - Private Line services for switched carriers;
 - OC-3 and OC-12 capacity for high-speed coast-to-coast transmission;

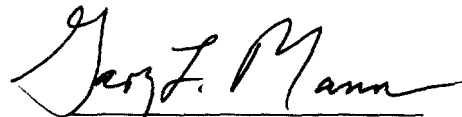
- Long distance for resale applications with enhanced features for all long distance services;
- Toll-free calling including 800 PIN for multiple termination;
- Card services;
- Advanced data services providing high-speed voice, video and data transmission based on Frame Relay (56 Kbps to 1.536 Mbps) and Asynchronous Transfer Mode (45 Mbps to 622 Mbps) technologies with complete network management services;
- Internet business services on a dial-up or dedicated connection;
- Complete back-office and billing solutions; and,
- 24-hour customer service and network support.

These services are provided as complete packages to satisfy reseller, carrier and IP customer needs and are particularly well suited for Internet, Intranet, Extranet, advanced data and multimedia services.

10. This range of products and services coupled with our outstanding nationwide fiber optic network should provide compelling evidence to the Commission that GTE's disparaging remarks about the abilities of carriers other than WorldCom should be completely disregarded.

I declare that the foregoing is true and correct to the best of my knowledge.

Dated: July 10, 1998

A handwritten signature in black ink, appearing to read "Gary L. Mann", written over a horizontal line.

Gary L. Mann
Assistant General Counsel
IXC Communications, Inc.
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Austin, Texas 78746
512-231-5217